

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

SABRINA JACK,	)	
	)	Cause No.:
Plaintiff,	)	
	)	Division:
v.	)	
	)	
UNITED STATES OF AMERICA,	)	
	)	<b>JURY TRIAL DEMANDED</b>
Defendant.	)	

**COMPLAINT**

**COME NOW** Plaintiff, Sabrina Jack, by and through her undersigned attorney, and states the following for her Complaint against Defendant:

**JURISDICTION AND VENUE**

1. This action arises under Title 28, United States Codes Section 2671 et seq. The court has jurisdiction under 28 U.S.C. §1346.
2. Venue is appropriate in this judicial district because the events which gave rise to this Complaint occurred within this District.
3. At all times of the events which gave rise to this complaint, Plaintiff Sabrina Jack was and is a citizen of the United States who resides in St. Louis County, State of Missouri.
4. At all times of the events which gave rise to this complaint, Melvin Perry Jr. was an agent and employee of the United States Postal Service which is an administrative agency for the United States of America.

**FACTUAL BACKGROUND**

5. On or about July 16, 2015 Plaintiff was traveling northbound on the Highway-67 exit ramp in Hazelwood, Missouri when she stopped her vehicle at red traffic light signal.

6. At that same date and time, Melvin Perry Jr. was driving a 2007 Mack semi-truck for the United States Postal Service when he also approached the same red light traffic signal as the Plaintiff. After the traffic signal turned green, Melvin Perry Jr. accelerated his vehicle and rear ended the motor vehicle driven by the Plaintiff.

7. Plaintiff sustained injuries in the collision.

8. Mr. Perry was acting in the official capacity on behalf of the United States Postal Service in the delivery of United States mail at the time of the crash, as was his vehicle.

9. Defendant, acting through its agent and employee, Melvin Perry, was negligent in one or more of the following ways:

- a) Failure to keep a careful lookout;
- b) Failure to yield the right of way to Plaintiff;
- c) Driving at an excessive speed under the circumstances; and
- d) Rear ended Plaintiff's vehicle.

10. As a direct and proximate result of the negligence and carelessness of Melvin Perry Jr., acting as agent in his official capacity for the United States of America, Plaintiff was injured and suffered damages, including injuries to Plaintiff's back, neck, and left shoulder.

11. As a direct and proximate result of the negligence and carelessness of Melvin Perry Jr., acting as agent in his official capacity for the United States of America, the Plaintiff has incurred reasonable and necessary medical expenses in the amount of \$43,395.72.

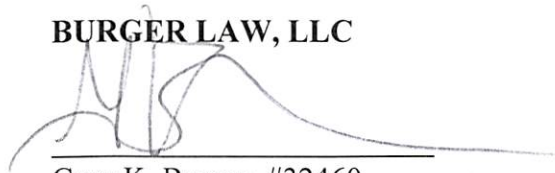
12. As a direct and proximate result of the negligence and carelessness of Melvin Perry Jr., acting as agent in his official capacity for the United States of America, Plaintiff has incurred other economic and non-economic damages, including wage loss damages, in the sum of \$395,733.17.

13. Notice of a claim was properly submitted to the United States Postal Service which was officially denied by letter dated October 7, 2016.

**WHEREFORE**, Plaintiff Sabrina Jack prays for judgment against Defendant, United States of America, for her damages in the amount of \$439,128.89.

Respectfully Submitted,

**BURGER LAW, LLC**

A handwritten signature in dark ink, appearing to read 'GK Burger', is written over a horizontal line.

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